EXHIBIT 2

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	§ § § §	MDL NO. 2875 HONORABLE ROBERT B. KUGLER DISTRICT COURT JUDGE

ORAL AND VIDEOTAPED DEPOSITION OF
JOHN QUICK
JANUARY 28, 2022

ORAL AND VIDEOTAPED DEPOSITION OF JOHN QUICK, produced as a witness at the instance of the Defendants and duly sworn, was taken in the above styled and numbered cause on January 28, 2022 from 8:00 a.m. to 12:09 p.m., before JANALYN ELKINS, CSR, in and for the State of Texas, reported by computerized stenotype machine, at the offices of Slack Davis Sanger, LLP, 6001 Bold Ruler Way, Suite 100, Austin, Texas, pursuant to the Federal Rules of Civil Procedure and any provisions stated on the record herein.

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(Witness previously sworn)

VIDEOGRAPHER: Here begins the continuation of the deposition of John Quick. Today's date is January 28, 2022. We are on the record at 8:12 a.m.

EXAMINATION

Q. (BY MR. GOLDBERG) Good morning, Mr. Quick.

A. Good morning.

Q. We're going to pick up with the questioning regarding the ZHP portion of your report that we were discussing yesterday. Just before we get started, we sent your -- we sent plaintiff's counsel some documents earlier this morning. Did you look at those documents?

A. I have not seen those documents.

Q. Okay. I want to ask you, in your report from Pages 20 to 25, you've identified five areas that in your opinion ZHP's CGMP's were deficient. Am I correct?

A. I'm not sure of five. Probably -- if you say it's five, it probably is five. I didn't count the number here.

Q. Well, if you just look at the headings there, there are five headings. These are -- these are five general areas.

A. Okay.

Q. So are these the five -- are these five areas -- I guess are these five areas you are claiming

impurity that was detected in 2018, correct?

A. Well, I don't know, so I can't say correct because I don't know. I'd have to go back and look at the documents. Again, as I said I did not do an exhaustive search of documents. My focus here was to look at the specific examples of CGMP deficiencies that apply to the class.

Q. Is it fair to say, sir, that if the root cause assessment that Mylan conducted in 2018 is not listed on Exhibit A to your report, then you didn't review it in preparing your report, correct?

A. Well --

MR. DAVIS: Object to form.

You can answer.

THE WITNESS: So the documents that I reviewed, again as I said, I didn't necessarily review all documents. I only reviewed examples that I -- as I said in my report, they were examples. It was not an exhaustive report. It was not intended to be an exhaustive report. If there were further work beyond this on merits report, probably would get into that type of thing.

Q. Sure. I understand that's your testimony. But I also heard you testify yesterday that if it's not in Exhibit A, I probably haven't reviewed it. Do you

it was not manufactured at that facility.

MR. DAVIS: Object to form.

THE WITNESS: So I'm saying the same thing again is that if there's a CGMP deficiency in one operation in one part of the facility or another facility, it should be the responsibility of the pharmaceutical manufacturer to ensure that those deficiencies are corrected across the operations, all the operations.

But that's not -- that's not really the subject of my report. I didn't get into that kind of detail. My point is my report identified examples of CGMP deficiencies. There may be others and if I had additional information at some point, we would review that information in light of this. This is not a merits report. It's -- it's an attempt to identify examples of CGMP deficiencies.

Q. (BY MR. STOY) Sure. But just to be clear, the document that you are relying on on this page of your report in order to form your opinions is this Unit 7 EIR document, right?

MR. DAVIS: Object to form.

Q. (BY MR. STOY) That's the one you're quoting, right?

A. That's -- that is the one I'm referencing. If

nitrosamines varied among the manufacturers' products?

MR. DAVIS: Object to form.

THE WITNESS: There may have been some variability, but that's not at all relevant to my report relevant to the CGMP deficiencies.

Q. (BY MR. HUNCHUCK) Do you have an understanding as to why there was variability in the nitrosamines?

A. I --

MR. DAVIS: Object to form. Objection, outside the scope.

THE WITNESS: That's not an area I reviewed. It was not part of the assignment relative to this report relative to the CGMP deficiencies. We may get into that later on if we go beyond this report to a merits report. But that has not been the scope of this report.

Q. (BY MR. HUNCHUCK) Do you know what manufacturer of valsartan products inspected their products for nitrosamines prior to 2018?

MR. DAVIS: Object -- sorry. No objection.

THE WITNESS: I missed the first part of that.

MR. DAVIS: Can you repeat the question, Steven?

Q. (BY MR. HUNCHUCK) Yes. Do you know which

were provided?

MR. DAVIS: Object to form. Same instruction.

THE WITNESS: Well, my --

MR. DAVIS: You can answer.

THE WITNESS: Okay. So I -- the documents that I relied on for my report are the documents that I reviewed and are Exhibit A. That's -- those are the documents I relied on for my report. So there may have been other documents that I didn't rely on these for my report.

Q. (BY MS. NAGLE) Okay. And I'm just trying to understand why -- why you excluded these 34 documents is all.

A. Well, okay. So I cannot answer that question without actually looking at those documents. But I'll go back to the comments I made before. My report only list examples. So there may be other examples that would be in these documents which might be in a report later, a merits report or something beyond that. But the documents that I relied on for my report are the documents that are in Exhibit A. So I'm not sure specifically why these additional documents were not relied on other than the fact I didn't need them relative to providing the examples that I have in my

report.

Q. Okay. So the additional documents found on -- on this Exhibit 33 do not serve as a basis for any of the opinions contained in your report, correct?

MR. DAVIS: Object to form.

THE WITNESS: What I -- what I said was is that the documents that I relied on for my report are the ones that are Exhibit A.

Q. (BY MS. NAGLE) Okay. So you're not relying on any of these additional documents found in this exhibit?

A. If they're not in that Exhibit A, the answer is no.

MS. NAGLE: Okay. I have no further questions for you, Mr. Quick. Thank you. I think one of my colleagues has some clean-up questions, but appreciate your time today. Thank you.

THE WITNESS: All right. Thank you.

MS. ISIDRO: I have just a few questions briefly.

MR. DAVIS: Are you going to retread any ground or -- I don't think our protocol --

MS. ISIDRO: It's just -- just some follow-up based on the question today.

MR. DAVIS: I don't think our protocol is to have another bite at the apple here.

defendants are adulterated?

A. Yes.

Q. Okay. Okay. Your -- your report has a number of exemplary sort of what you describe as examples of corporate level CGMP failures, in your words, that you provide as to each of the manufacture defendants; is that right?

A. That's right.

Q. Okay. How long have you been in the pharmaceutical and -- and general sort of FDA medical device industry, sir?

MS. ISIDRO: Objection.

THE WITNESS: Over 55 years.

Q. (BY MR. DAVIS) Okay. And your -- your observations in this declaration, are they based only on the documents and other materials or are they also based on those 55 years of experience that you have?

MS. ISIDRO: Objection, form.

THE WITNESS: They are based on my experience in addition to the documents.

MR. DAVIS: Thank you. No further questions.

Okay. Hearing nothing else, I think we can wrap it up and go off the record.

VIDEOGRAPHER: Okay. This concludes the

deposition of John Quick. Off the record at 12:08 p.m.

(Proceedings concluded at 12:09 p.m.)

REPORTER'S CERTIFICATION
DEPOSITION OF JOHN QUICK
VOLUME 2 OF 2
TAKEN JANUARY 28, 2022

I, Janalyn Elkins, Certified Shorthand Reporter in and for the State of Texas, hereby certify to the following:

That the witness, JOHN QUICK, was duly sworn by the officer and that the transcript of the oral deposition is a true record of the testimony given by the witness;

That the original deposition was delivered to MS. NILDA ISIDRO;

That a copy of this certificate was served on all parties and/or the witness shown herein on _____.

I further certify that pursuant to FRCP No. 30(f)(i) that the signature of the deponent was requested by the deponent or a party before the completion of the deposition and that the signature is to be returned within 30 days from date of receipt of the transcript. If returned, the attached Changes and Signature Page contains any changes and the reasons therefor.

I further certify that I am neither counsel for, related to, nor employed by any of the parties in

the action in which this proceeding was taken, and further that I am not financially or otherwise interested in the outcome of the action.

Certified to by me this 6th day of February 2022.

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